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6 UNITED STATES DISTRICT COURT  
7 NORTHERN DISTRICT OF CALIFORNIA  
8 SAN FRANCISCO DIVISION

9  
10 DAVID WIT, et al.,

11 Plaintiffs,

12 v.

13 UNITED BEHAVIORAL HEALTH,

14 Defendant.

Case No. 14-cv-02346  
Related Case No. 14-cv-05337

**DECLARATION OF DOUGLAS R.  
YOUNG RE APPOINTMENT AS  
SPECIAL MASTER**

15 GARY ALEXANDER, et al.,

16 Plaintiffs,

17 v.

18 UNITED BEHAVIORAL HEALTH,

19 Defendant.

20  
21 I, Douglas R. Young, declare as follows:

22 1. I am an attorney admitted to practice before this Court. I am a partner with Farella  
23 Braun + Martel LLP ("Farella"). I submit this declaration pursuant to Federal Rule of Civil  
24 Procedure Rule 53(b)(3) and 28 U.S.C. § 455. I have personal knowledge of the facts set forth  
25 below and, if called as a witness, I could and would competently testify to the matters stated  
26 herein.

27 2. Farella's New Business Department has completed a conflicts check and has found  
28 no conflict in this proceeding.

3. In addition to the review conducted by Farella's New Business Department, I personally have reviewed the docket sheets in *Wit v. United Behavioral Health*, Case No. C-14-2346 and *Alexander v. United Behavioral Health*, Case No. 14-5337, and have thoroughly familiarized myself with the issues in those cases. Based on that review, I conclude that there is no ground for disqualification under 28 U.S.C. § 455.

4. I do not have a personal bias or prejudice concerning any party to this action, nor do I have personal knowledge of disputed evidentiary facts concerning the proceeding.

5. Neither I nor any attorney at Farella has served as a lawyer in this action or has been a material witness concerning it.

6. Neither I, individually or as a fiduciary, nor my spouse has a financial interest in the subject matter in controversy or in a party to this proceeding, or any other interest that could be substantially affected by the outcome of this proceeding.

7. Neither I, individually or as a fiduciary, nor my spouse, nor a person within the third degree of relationship to either of us, or the spouse of such a person:

- a. is a party to this proceeding, or an officer, director, or trustee of a party;
- b. is acting as a lawyer in this proceeding;
- c. has, to my knowledge, an interest that could be substantially affected by the outcome of this proceeding; or
- d. is, to my knowledge, likely to be a material witness in this proceeding.

8. In short, there are no grounds for disqualification under 28 U.S.C. §455.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on December 18, 2020 in Oakland, California.

Douglas R. Young